



75 SOUTH BROADWAY, SUITE 409, WHITE PLAINS, NEW YORK 10601 TELEPHONE 212-658-1455 FACSIMILE 877-607-5419  
NEW YORK • VANCOUVER • VICTORIA • CALGARY • EDMONTON • REGINA • SASKATOON • TORONTO • MONTREAL

VIA ELECTRONIC MAIL

April 10<sup>th</sup>, 2015

Re: United States v. Rene Cardona  
14 CRIM 314 (RA)

The Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Dear Judge Abrams:

I write to respectfully request that the conference scheduled for 11:00 a.m. today be rescheduled to Monday, April 13<sup>th</sup>, 2015 at 2:30 p.m. The Government consents to this request.

The reason for my request is that I have just learned from the Government that Mr. Cardona refused to be transported from MDC Brooklyn to the courthouse this morning. I have since been in communication with Mr. Cardona who thought the Marshals were attempting to transport him by mistake given that he had court yesterday and that his next court date was scheduled for July 24<sup>th</sup>, 2015. Mr. Cardona has been advised that the matter has been rescheduled, subject to the Court's approval to 2:30 p.m. on April 13<sup>th</sup>, 2015.

We sincerely apologize for any inconvenience this has caused the Court.

Respectfully,

Merchant Law Group LLP

By: *Daniel DeMaria*  
Daniel DeMaria (DD4130)

cc: Gina Castellano, Esq. (via electronic mail)  
Assistant United States Attorney

Andrew DeFilipis, Esq. (via electronic mail)  
Assistant United States Attorney

Carlos Moreno, Esq. (via electronic mail)  
Co-Defense Counsel